

RYAN MCDONALD,

Plaintiff,

v.

LG CHEM, LTD.

Defendant.

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IN THE

UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF MARYLAND


Civil Action No.: 1:16-cv-01093-RDB

**DEFENDANT LG CHEM, LTD.'S MOTION *IN LIMINE*  
TO EXCLUDE TESTIMONY OF PLAINTIFF'S LIABILITY  
EXPERT, DAVID ZUCKERBROD, Ph.D. PURSUANT TO  
FED. R. EVID. 104(a) AND FED. R. EVID. 702**

Defendant, LG Chem, Ltd. ("LG Chem") respectfully moves *in limine* to exclude testimony of Plaintiff's liability expert, David Zuckerbrod, Ph.D. pursuant to Fed. R. Evid. 104(a) and Fed. R. Evid. 702.

The grounds for this Motion *in Limine* are further set forth in LG Chem's Memorandum of Law in support of its Motion *in Limine* to Exclude Testimony of Plaintiff's Liability Expert, David Zuckerbrod, Ph.D. Pursuant to Fed. R. Evid. 104(a) and Fed. R. Evid. 702 filed simultaneously herewith.

PHILLIPS, GOLDMAN, McLAUGHLIN  
& HALL, P.A.



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Attorneys for Defendant, LG Chem, Ltd.

Dated: February 20, 2018

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I filed a true and accurate copy of the foregoing Defendant LG Chem, Ltd.'s Motion *in Limine* to Exclude Testimony of Plaintiff's Liability Expert, David Zuckerbrod, Ph.D. Pursuant to Fed. R. Evid. 104(a) and Fed. R. Evid. 702 with the Clerk of the Court using the CM/ECF system, which caused a true and correct copy of the same to be sent electronically to:

Shani Dinovitz, Esquire  
Law Offices of Shani Dinovitz, LLC  
2910 W. Strathmore Avenue  
Baltimore, MD 21209



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